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July 29, 2003

The Honorable William M. Nickerson
United States District Court
for the District of Maryland
101 W. Lombard Street
Baltimore, Maryland 21202

Re: Eric Williams v. H. D. Industries, Inc.
Civil Action #WMN 02-2147

Dear Judge Nickerson:

I am writing to provide you with the parties' status report pursuant to the current Scheduling Order.

a. This is a rather complicated matter and, although a fair amount of discovery in this case has been completed, additional depositions are necessary. Plaintiff wishes to depose a corporate designee of H.D. Industries and our expert. Similarly, we have inquired regarding the availability of Plaintiff's expert. Additionally, Plaintiff's counsel has recently asked my client to supplement his discovery responses and we are in the process of conducting additional investigation accordingly. The parties would like to extend the discovery deadline by motion to accommodate these actions and have agreed to cooperate to ensure all necessary discovery is completed.

b. There are no motions currently pending, although, as indicated above, the parties anticipate the possibility of filing a joint request to extend the discovery deadline.

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c. H.D. Industries intends to file a dispositive motion. Plaintiff does not intend to file such a motion.

d. A jury trial has been requested. The parties believe the trial would likely last three days.

e. No settlement discussions have occurred since the commencement of litigation.

f. Defendant is not interested in ADR.

g. The parties do not consent to having the case assigned to a magistrate judge.

The parties have no other issues to address with the Court at this time. If Your Honor requires any additional information, we would be happy to provide it.

Very truly yours,

Jonathan A. Cusson